

To: Manville, Jennifer[manville.jennifer@epa.gov]
Cc: Dee.allen@ldftribe.com[Dee.allen@ldftribe.com]
From: Hanson, Kristen
Sent: Fri 4/29/2016 5:12:28 PM
Subject: LDF Advisement help
Draft Groundwater Monitoring Results Haskell Lake Petroleum Contamination Site with April 2016 data.xlsx
Tower Standard SOW 4-2016 revised draft (2).docx

Good Morning Jenny,

I would like to take you up on your offer for a call before the May 6th call. At this point in time, I really could use some Jenny Technical Help.

Bob has sent a TO, but then retracted some of the work. I appreciate him sharing his plans, but am very frustrated. I need to respond back to him, but see some systemic problems creating a planning nightmare. Your insight is appreciated.

Here is some of my frustrations:

Revised Task Order

The first August 28th Task Order wasn't implemented. It included a Site Investigation Workplan, 4 well nests (3 wells at appropriately screened depths), and 15 soil borings to 20 feet. In the last breath of the fiscal year, Bob revised the scope of work without including evaluation of previous data to include 15 soil borings to 15 feet, vapor intrusion sampling, and flying Bristol to meet with us. By this time we knew that source area contamination included some unsaturated soil contamination next to the tank basin, a very large area of thick smear zone/water table impacts, and impacts at depth (greater than 20 feet, less than 35 feet- free product on soil cuttings). In fact, this was known in last fall. The revised task order didn't reflect the information we knew about the site. This was cemented into a sampling plan that wasn't flexible to include things like: 1) the appropriate method to access source area (ALL agreed this was the case before work proceeded – Bristol, EPA, Tribal, and even the State WDNR representative), 2) the sampling parameters did not include the chemicals of concern previously identified on site.

In the end, a lot of money was spent, the source area is still not defined at depth. There is 50k or better left over, and the cost to include the geotechnical probe technology- LIF was \$3750. The geoprobe contractor selected for this job had the capacity and experience to deploy the LIF at the time work was being rushed through. Now Bob is telling us first that the work can be

duplicated with the appropriate tooling and the then the same day retracting the soil characterization work (email thread below- April 21st correspondence from Bob).

Today there is not one well screened in the source area, we knew this in October when DNR told us there plans to install wells at the water table and 40 feet. Of the four well nests at three depths (twelve wells total) planed in the original August 28th TO, the State has installed water table wells at three of the four locations. Therefore the state effort has filled in 3 of the 12 planned wells.

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The Source Removal Funding

BIA has funded \$70k toward source soil excavation, trucking, and backfill. We has estimated \$30k toward source area delineation and excavation planning and \$42k toward landfill disposal costs. The delineation work, excavation planning, and landfill disposal fees were not funded. EPA was notified of this last fall. Utilizing this funding requires a cooperative effort. Bob seems to think that the Tribe is conducting this excavation on our own and refers to this as the Tribe's plan. Although, the Tribe was not at the February EPA-State meeting, Bob did present Tribal plans to WDNR and I understand this was included.

Planning Work without Evaluating Previous Data

The only data evaluation/planning activity that EPA has produced was Bristol's cross sections. These were done after the March 2016 field work plans were cemented in Bob's Task Order and came after Bristol's Sampling Plan.

Again Bob has sent a task order without evaluating previous data. I had asked for the soil analytical reports from the March Sampling Effort in order to evaluate existing data before more work is cemented. I was only able to get the soil analytical reports after asking for them. Bob received them on April 13th, we got a copy of them on April 29th. When asked about data eval, Bob suggested including in some future Task Order.

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No Site Investigation Plan

There is no Site Investigation Plan and no plan in the foreseeable future. Small isolated uncoordinated scopes of work are being designed and implemented. Our Enforcement letter to the Kozaks requires a Site Investigation Plan within 60 days of their PLP notice (September 10 2016) and EPA's enforcement letter requires a Corrective Action Plan within 45 days. A forward looking Site Investigation Plan that includes the data known to date is something the Tribe has been asking from EPA. This is the normal Site Assessment process for us and this process was agreed to in conference call on April 28th 2015. Both Tribal Legal and EPA legal along with EPA program staff was on the phone. Bob agreed that this was how things would be done- standard practice.

What would be helpful to me

I am struggling with how to effectively work with the EPA LUST program. An example of a completed assessment and cleanup with soil and groundwater contamination would help me understand what has worked for others.

I Need HELP/ADVISEMENT

I appreciate any help or advisement on how best to respond to this last task order.

Thank you for your consideration,

Kristen

From: Hanson, Kristen
Sent: Thursday, April 28, 2016 3:57 PM
To: egan.robert@epa.gov
Subject: telephone message

Hi Bob,

I got your voice mail message. Thank you for the call. I understand that you will have a better idea of the remaining budget after you get the Bristol Bill.

I am reviewing the task order, thank you for sending it. I was out of the office for the 1st half of the week, but will get responses to you soon.

I included the Bristol gw results in the attached draft table. This table hasn't been QC yet, please hold off from sharing until the data entry QC is done. But I thought it would be important to the list of chemicals of concerns for sample parameter planning. A few more solvents showed up in the recent Bristol sampling event. Some of these were historically present in the contaminated private wells. Our COC list includes petroleum, solvents, metals, lead & lead scavengers. I need to look into this more, but am thinking the solvents are contributing to the lack of degradation occurring within the plume. This could be a limiting factor.

The well installation of 14 wells was completed in 3.5 days. I figured this would be useful to setting aside oversight time.

If you have received the soil analytical results, could you please forward them on?

Kristen Hanson

Environmental Specialist

Tribal Natural Resource Department

Lac du Flambeau Band of Lake Superior Chippewa Indians

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From: Egan, Robert [mailto:egan.robert@epa.gov]
Sent: Friday, April 22, 2016 10:20 AM
To: Hanson, Kristen
Cc: Allen, Dee; Wawronowicz, Larry; Kamke, Sherry
Subject: RE: new task order cost

Hi Kristen,

I have about \$50K left to use until we get more money from HQ. The well costs for 2 would be 2-3 days of drilling at about \$2000 per day for the rig and labor, and some extra for materials. Mobilization costs another \$1000-1500.

BERS time, of course, adds quite a bit of cost but we would only need one field person to oversee drilling, development and sampling.

So we can do the well installation and sampling without a problem. The time to oversee REI work would take a lot of hours, plus travel and per diem, and a separate mobilization. I had planned about 14 days of field time since I do not know how many wells they will put in, if any, in the near future. But we would need to have BERS on a task order to do the oversight in case it comes up and we want to do it. I would not expect have time to get a separate task order approved and in place to do oversight if we found out that REI was ready to do more field work.

Hope this helps. We are hoping to hear soon from HQ about funding for this year, but we haven't heard a target date for notifying us of the amount.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

From: Hanson, Kristen [<mailto:KHanson@ldftribe.com>]
Sent: Friday, April 22, 2016 10:05 AM
To: Egan, Robert <egan.robert@epa.gov>
Cc: Dee.allen@ldftribe.com; lwawronowicz@ldftribe.com
Subject: RE: new task order cost

Good Morning Bob,

I just left a voice mail.

I am reviewing the Task Order you send, but understand there is some cost problems and it needs to be scaled down or changed. What is the dollar amount target for this TO and what do the wells come in at? I can better provide input into options with a ballpark idea of cost and available funds.

Kristen

From: Egan, Robert [<mailto:egan.robert@epa.gov>]
Sent: Thursday, April 21, 2016 3:27 PM
To: Hanson, Kristen
Cc: Kamke, Sherry
Subject: new task order cost

Hi Kristen,

I should have run my cost estimate first for our next set of work. I know now that there will not be enough money to do everything I put into the draft task order SOW.

I made a call to do a little research on the MIP work and it will cost between \$3000-4500 per day, and another "several thousand" to do the post processing on the data to produce the 3D images. I fully expect that will have money to do this when we receive our new allotment of funds, but I can't do it with what we have left from last year.

We should talk about this. I know you want to have BERS ready to observe the REI work if they drill new wells, and we want BERS to install those 2 additional wells and get the samples prior to the USGS work this summer. These things I think we can do. It ties up some money as we wait for REI to do something, but we want to be ready if they do get to the field sometime soon.

Also, in talking to the drilling company I called, the MIP technique is only best suited to total VOC contaminants above 1000 ppb (dissolved), and only works on the lighter compounds. We have that, but it may be less successful for definition around the plume margins. I would like to learn more about the VAS work that was done. Maybe this would also be an option, especially if we could have a field GC running total VOC analysis so we get results quickly. I should have BERS research this as part of the task order and propose the best method to help us plan the well network. There may be other methods out there too that haven't been considered.

Let me know what you think and what your top priorities are for our available funding in the short term. If we do the 2 wells and audit the state work, those items were in your e-mail list of priorities sent to me on 3/30. The other short-term item was for cross sections, etc., and most of the items from your Short-term #2 were delivered with the tech memo this week. Additional data analysis and recommendations could be added to this task order if there is something specific we want.

Sorry to have to pull back on plans for some of the work for the short term. I thought we might be able to fund it all for this nest task order but the drilling is pricier than I had considered.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

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From: Egan, Robert [mailto:egan.robert@epa.gov]
Sent: Friday, April 29, 2016 8:10 AM
To: Hanson, Kristen
Subject: RE: Pace report 10343513

I took a quick look at it, but nothing formal.

If you have any specific concerns, we can have Bristol do an analysis as part of the next task order to see how these results fit in with the past sampling.

Bob Egan

Corrective Action Manager

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From: Hanson, Kristen [mailto:KHanson@ldftribe.com]
Sent: Friday, April 29, 2016 8:06 AM
To: Egan, Robert <egan.robert@epa.gov>
Subject: RE: Pace report 10343513

Hi Bob,

Did you review this or do any data eval?

Kristen

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Egan, Robert" <egan.robert@epa.gov>
Date: 04/29/2016 7:27 AM (GMT-06:00)
To: "Hanson, Kristen" <KHanson@ldftribe.com>
Subject: FW: Pace report 10343513

Here are the soils.

Bob Egan

Corrective Action Manager

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From: Faust, Matt [<mailto:mfaust@bristol-companies.com>]
Sent: Wednesday, April 13, 2016 6:38 PM
To: Egan, Robert <egan.robert@epa.gov>
Subject: Pace report 10343513

Bob,

It looks like you didn't get copied on this submittal. I'll check with Pace and make sure that you get copied on the final two reports (second half of waters and the air samples).

Thanks,

--Matt

Matt Faust, P.G.

Project Manager/Geologist
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